

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

Eva Marisol Duncan

Plaintiff,

vs.

JPMorgan Chase Bank, N.A.

Defendant.

Civil Action No. SA-14-CA-912-FB

SCHEDULING RECOMMENDATIONS

TO THE HONORABLE FRED BIERY, CHIEF UNITED STATES DISTRICT JUDGE:

The parties recommend that the following deadlines be entered in the scheduling order to control the course of this case:

1. A report on alternative dispute resolution in compliance with Local Rule CV-88 shall be filed by March 16, 2015.
2. The parties asserting claims for relief shall submit a written offer of settlement to opposing parties by March 16, 2015, and each opposing party shall respond, in writing, by March 30, 2015.
3. The parties shall file all motions to amend or supplement pleadings or to join additional parties by April 15, 2015.
4. All parties asserting claims for relief shall file their designation of potential witnesses, testifying experts, and proposed exhibits, and shall serve on all parties, but not file the materials required by FED. R. CIV. P. 26(a)(2)(B) by September 22, 2015. Parties resisting claims for relief shall file their designation of potential witnesses, testifying experts, and proposed exhibits, and shall serve on all parties, but not file the materials required by FED. R. CIV. P. 26(a)(2)(B) by November 4, 2015. All designations of rebuttal experts shall be designated within 15 days of receipt of the report of the opposing expert.
5. An objection to the reliability of an expert's proposed testimony under Federal Rule of Evidence 702 shall be made by motion, specifically stating the basis for the objection and identifying the objectionable testimony, within 30 days of receipt of the written report of the expert's proposed testimony, or within 30 days of the expert's deposition, if a deposition is taken, whichever is later.
6. The parties shall complete all fact discovery on or before August 17, 2015, and all expert discovery on or before December 15, 2015. Counsel may by agreement continue discovery

beyond the deadline, but there will be no intervention by the Court except in extraordinary circumstances, and no trial setting will be vacated because of information obtained in post-deadline discovery.

7. Plaintiff shall file her Motion for Class Certification no later than December 4, 2015. Defendant shall file its Opposition to Class Certification no later than January 11, 2016. Plaintiff shall file her Reply no later than January 25, 2016.

8. All dispositive motions shall be filed no later than April 19, 2016. Dispositive motions as defined in Local Rule CV-7(h) and responses to dispositive motions shall be limited to 20 pages in length.

9. The trial date will be determined at a later date by the Court. The parties shall consult Local Rule CV-16(e) regarding matters to be filed in advance of trial. At the time the trial date is set, the Court will also set the deadline for the filing of matters in advance of trial.

10. All of the parties who have appeared in the action conferred concerning the contents of the proposed scheduling order on February 5, 2015, and the parties have agreed as to its contents.

Dated: February 16, 2015

Respectfully submitted.

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